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January 17, 2025

**Via ECF and Email**

Judge Analisa Torres  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 15D  
New York, NY 10007  
(Torres\_NYSDChambers@nysd.uscourts.gov)

Re: *Indian Harbor Insurance Company v. CB&I Contractors, Inc.; CB&I Shaw Constructors, Inc.; CB&I LLC; McDermott International, Ltd.*, Case No. 24-cv-08764

Dear Judge Torres:

The undersigned, Creighton K. Page, represents Defendants CB&I LLC and McDermott International, Ltd. (together, "Defendants") in the above-captioned action. I write jointly with Lloyd Gura & Pamela Minetto, who are counsel for Plaintiff Indian Harbor Insurance Company (the "Plaintiff"), to inform the Court that the parties have agreed to participate in a private, confidential mediation in an attempt to resolve the disputes that are the subject of this action. The mediation is currently scheduled to take place on April 8, 2025.

In light of the upcoming mediation, the parties jointly request that the Court enter an Order staying all proceedings and adjourning all deadlines in this action, including, without limitation, the deadline for any of the named defendants in this action to file a responsive pleading to the complaint and the deadline for the parties to submit their jointly proposed Case Management Plan and Scheduling Order. Within two weeks after the conclusion of the mediation, the parties will jointly report to the Court concerning whether the mediation was successful in resolving the parties' disputes. If the parties are unable to reach a resolution at mediation, the parties will include in their joint report a proposal for new deadlines for the filing of responsive pleadings and the joint proposed Case Management Plan and Scheduling Order. It is our joint understanding that the brief stay will not impact any future discovery schedule should we be unable to resolve our dispute.

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We thank the Court for its attention to this matter and respectfully request that the Court enter the requested Order staying all proceedings and adjourning all pending deadlines in this action.

Respectfully Submitted,

/s/ Creighton K. Page  
Creighton K. Page  
*Counsel for Defendants CB&I LLC and  
McDermott International, Ltd.*

/s/ Lloyd Gura  
Lloyd Gura  
Pamela Minetto  
*Counsel for Plaintiff Indian Harbor Insurance  
Company*

This matter is STAYED pending the parties' mediation scheduled for April 8, 2025. By **April 15, 2025**, the parties shall submit a joint letter informing the Court whether mediation was successful and, if not, how they intend to proceed with this matter. If mediation is not successful, the parties shall also submit a proposed case management plan by that same date.

SO ORDERED.

Dated: January 21, 2025  
New York, New York

  
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ANALISA TORRES  
United States District Judge